

In the  
**United States District Court**  
For the  
**Western District of Wisconsin**

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Estate of Thomas Smith, by  
Shannon Bryfczynski,  
Special Administrator,

Plaintiff,

v.

Case No. 19-cv-972

Oneida County, the Town of Minocqua,  
Gary Loduha and Stetson Grant,

Defendants.

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**PLAINTIFFS' AMENDED DISCOVERY RESPONSES**

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The Plaintiff, by its attorneys, William Laman Law Office, by Attorney William F. Laman, and The Jeff Scott Olson Law Firm, S.C., by Attorney Jeff Scott Olson, hereby makes the following amended responses:

**REQUESTS FOR ADMISSION**

REQUEST NO. 1: Admit that Thomas Smith's cause of death was hypertensive cardiovascular disease.

**Plaintiff's Response:      Admitted that hypertensive cardiovascular disease was the proximate cause<sup>1</sup> of Thomas Smith's death.**

REQUEST NO. 3:    Admit that Gary Loduha's actions did not cause Thomas Smith's death.

**Plaintiff's Response:      Admitted that Gary Loduha's actions were not a proximate cause of Thomas Smith's death.**

REQUEST NO. 4:    Admit that Stetson Grant's actions did not cause Thomas Smith's death.

**Plaintiff's Response:      Admitted that Stetson Grant's actions were not a proximate cause of Thomas Smith's death.**

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<sup>1</sup> The Supreme Court has said:

*Every event has many causes, however and only some of them are proximate, as the law uses that term. So to say that one event was a proximate cause of another means that it was not just any cause, but one with a sufficient connection to the result.*

*Paroline v. United States*, 572 U.S. 434, 444, 134 S. Ct. 1710, 1719, 188 L. Ed. 2d 714 (2014) (internal quotation marks and citations omitted)

Dated this Thursday, May 27, 2021.

Respectfully submitted,

Estate of Thomas Smith,

Plaintiff

By

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/s/ Jeff Scott Olson

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Jeff Scott Olson

ATTORNEYS FOR PLAINTIFF